



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF HEALTH AND HUMAN SERVICES  
AGING & ADULT SERVICES AGENCY  
LANSING

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DIRECTOR

**DATE:** March 17, 2020  
**TO:** Area Agency on Aging Directors  
**FROM:** Dr. Alexis Travis, Senior Deputy Director  
**SUBJECT:** Additional Policy Guidance for Senior Nutrition Programs (AASA COVID-19 2020-1)

**TRANSMITTAL LETTER #2020-404**

The Michigan Department of Health and Human Services, Aging and Adult Services Agency (AASA) has a responsibility to provide policy guidance to area agencies on aging (AAA) awarded funds under the Older Americans Act and from the Michigan Legislature. It is the purpose of this transmittal letter to provide additional clarification regarding senior nutrition programs.

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Attachment

## **Policy for Meal Distribution and Payment Source During a Declared National Emergency**

On Tuesday, March 10, 2020, Governor Gretchen Whitmer declared a State of Emergency (2020-4) for the State of Michigan.

Information on the State of Michigan response to COVID-19 can be found at:  
<https://www.michigan.gov/Coronavirus>

On Friday, March 13, 2020, the President declared that the ongoing Coronavirus Disease 2019 (COVID-19) pandemic is of sufficient severity and magnitude to warrant an emergency determination under section 501(b) of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. 5121-5207 (the "Stafford Act"), and that the emergency exists nationwide.

Information on the Stafford Act Declaration can be found at:  
<https://www.fema.gov/disaster-declaration-process>

Should a State or Tribe (Title VI grantee) request and receive a Major Disaster declaration by the President under the Stafford Act, this declaration triggers disaster relief authority in the Older Americans Act (OAA). (Section 310, OAA. See below).

### How This Affects the Aging Network in Michigan:

Area Agencies on Aging may use any portion of the funds made available under any and all sections of the Act for disaster relief for older individuals. Flexibility is given to use existing allocations already made to them under Title III-B, C-1, C-2, D, and E for disaster relief. For example, see *Older Americans Act (OAA), PLANNING, COORDINATION, EVALUATION, AND ADMINISTRATION OF STATE PLANS, SEC. 308. 4a* for additional guidance on existing flexibility to transfer up to 40% of OAA C1 and C2 nutrition program transfers.

This means that an area agency on aging may use Title III-B, C-1, C-2, D, and/or E funds to expand services not generally allowed in the funding category for any disaster relief activities associated with that funding category, for older individuals or family caregivers served under the OAA, which may include, but are not limited to:

- providing drive through, take out, or home-delivered meals,
- providing well-being checks via phone, in-person, or virtual means, and
- providing homemaker, chore, grocery/pharmacy/supply delivery, or other services.

Examples of this include:

- Using III-C-1 funding to provide take out meals (may be frozen, cold or shelf-stable).

- Using III-D to do daily phone well-being checks.

#### Congregate Meals

Take out/drive thru meals may be picked up by a proxy.

- Keep a record of participant name, number of meals given, and who picked up the meal.
- Continue to count meals given to a congregate participant as congregate.

#### Home Delivered Meals

HDM meal participants may receive multiple meals in the form of frozen, cold or shelf-stable as long as they know how to use them correctly. For example, have a microwave or oven and know how to use it.

- Continue to count meals given to HDM participants as HDM.

#### Voucher Meals

If participating restaurants have take out meals, voucher meal participants should be encouraged to use that service. If no restaurant take out is available, every effort should be made to provide take out or drive thru meals through congregate sites.

#### Required data collection

Any funding used under this guidance must track the following:

- COVID-19 related expenditures using Title III-C-1 funding
  - Number of persons served
  - Number of meals served.
- COVID-19 related expenses using Title III-D funding
  - Number of persons served
  - Number of units

#### Financial Accounting

AAAs currently have the ability to transfer funds between C-1 and C-2 up to 40%. AASA will be requesting authority from ACL to go over and above the 40%. Updates will be issued as more information is available.

Please identify any funds spent under this guidance as "COVID-19" expenditures. Further guidance will be sent out as soon as we have it.

#### OAA Disaster Assistance Grant

Section 310 of the Act provides the ability of ACL to provide very limited amounts of disaster assistance to reimburse states and tribes for responding to Presidentially-declared Major Disasters. This disaster assistance is available to states and tribes who submit applications for such assistance as described at <https://acl.gov/grants/disaster-assistance-state-units-aging-suas-and-tribal-organizations-major-disasters-0>. At this time, ACL isn't accepting applications for disaster assistance related to COVID-19

through this funding opportunity announcement. Additional information and guidance regarding this limited assistance available directly from ACL will be forthcoming.